

Roberts, Bradley

From: Roberts, Bradley
Sent: Friday, August 26, 2016 3:29 PM
To: 'David_Anderson@oxy.com'
Cc: Charles.Janson@ghd.com; Jeff Johnson
Subject: RE: Occidental Wichita VI Investigation WP response to comments

David, The EPA tentatively approves the VI Investigation Plan based on GHD's 8-18-16 submittal and our more recent discussions represented below, and including the proposed sample locations figure you forwarded earlier today. I understand you will finalize the plan and provide a copy in the coming days. With this tentative approval, please proceed with implementation.

Brad Roberts, Environmental Scientist
AWMD/WRAP/RCAP
US EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Phone: 913-551-7279
Fax: 913-551-9279
Email: roberts.bradley@epa.gov

-----Original Message-----

From: David_Anderson@oxy.com [mailto:David_Anderson@oxy.com]
Sent: Thursday, August 25, 2016 3:06 PM
To: Roberts, Bradley <roberts.bradley@epa.gov>
Subject: Re: Occidental Wichita VI Investigation WP response to comments

Brad,

Yes, the pressure differential was a typo. It should be 0.001 inches of water.

Regarding the IA sampling, I'm not sure those necessarily need to be collected where the pressure readings are taken. The basement of the Admin Building has not been occupied in several years. I think it would make more sense to take these samples on the two occupied floors. Let me know if you'd like to discuss.

David Anderson

(713) 840-3090 office

Ex. 6 PII

On Aug 25, 2016, at 2:26 PM, Roberts, Bradley
<roberts.bradley@epa.gov<mailto:roberts.bradley@epa.gov>> wrote:

David, I just left you a voicemail to get clarification w/respect to the pressure differential reference below and w/respect to the sample collection of floors 1 & 2. I understand you normally do pressure differential readings at 3 locations (2nd floor, cafeteria and basement) for the Admin Building and I think if, in addition to your 8-18-16 response, you can propose to collect IA samples at those locations we can approve the plan.

Brad Roberts, Environmental Scientist
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From: David_Anderson@oxy.com<mailto:David_Anderson@oxy.com> [mailto:David_Anderson@oxy.com]
Sent: Thursday, August 25, 2016 1:48 PM
To: Roberts, Bradley <roberts.bradley@epa.gov<mailto:roberts.bradley@epa.gov>>
Cc: Charles.Janson@ghd.com<mailto:Charles.Janson@ghd.com>
Subject: RE: Occidental Wichita VI Investigation WP response to comments

Brad,

Per your voice message regarding GSH's response to comment #2, the pressure differential of 0.010 inches water column is based upon the guidance identified in Section 2.2.3 in "Radon Prevention in the Design and Construction of Schools and Other Large Buildings, U.S. EPA June 1994." Additionally, GSH will collect an indoor air sample via Summa Canisters on both the first and second floors of the Administration Building and GSH will concurrently collect pressure readings from the Administration Building pressure monitors. GSH will perform this work upon EPA's approval of the On-Site Vapor Intrusion Work Plan.

Thanks, Dave

(713) 840-3090 office

Ex. 6 PII

From: Roberts, Bradley [mailto:roberts.bradley@epa.gov]
Sent: Wednesday, July 27, 2016 2:07 PM
To: Anderson, David W <David_Anderson@oxy.com<mailto:David_Anderson@oxy.com>>
Cc: Charles.Janson@ghd.com<mailto:Charles.Janson@ghd.com>
Subject: Occidental Wichita VI Investigation WP response to comments

David, We've finished our review of your response to our previous (6-10-16) comments on the work plan. Our comments on this latest submittal are provided below:

1. General Comment - They note several documents addressing the off-site VI investigation but don't summarize the findings other than to note EPA indicated there was not a concern. Figure 1 depicts soil gas samples were collected near 7 of 13 structures at depths of 15 ft and 25 ft. They indicate access issues; however, at a minimum these samples could be collected from the public ROW. Those five documents weren't reviewed but at a minimum soil gas samples should be collected in the public ROW near the remaining occupied structures from a depth of either 5 ft or 8 ft, if the structure has a basement. If monitoring wells are present in the area of the homes, detected COC concentrations, with the proper groundwater temperature, could be used in the VISL calculator to determine the potential for IA concerns. This would provide an additional line of evidence in evaluating the potential for risks to human health from VI.

2. EPA Comment #2 - The RTC indicates because pressure monitoring has demonstrated that the exposure controls are operating as intended, additional sampling of indoor air is not necessary. Section 8.2.1, Page 145, Paragraph 1, Bullet 2 of the 2015 VI Guidance indicates "EPA recommends appropriate monitoring of pressure and other indicators (e.g., indoor air

monitoring) be conducted to ensure that adequate pressurization is sustained throughout areas of the building that could be subject to vapor intrusion".

I left you a voicemail a few minutes ago. If you want to talk about this give me a call.
Thanks.

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